

# Exhibit C

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO

ANHEUSER-BUSCH, INCORPORATED,	)	CASE NO. _____
	)	
Plaintiff,	)	JUDGE _____
	)	
v.	)	JURY DEMANDED
	)	
INTERNATIONAL BROTHERHOOD	)	
OF TEAMSTERS and TEAMSTERS	)	
LOCAL UNION 957,	)	
	)	
Defendants.	)	

**DECLARATION OF ELIZABETH M. O'CONNOR**

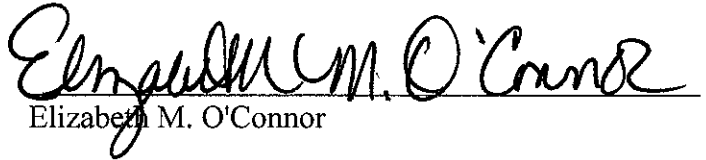
I, Elizabeth M. O'Connor, declare that:

1. I am an individual over the age of 21. I have personal knowledge of the facts stated herein and could testify competently thereto.
2. I am a paralegal in the law firm of Porter Wright Morris & Arthur LLP, one of the law firms representing Anheuser-Busch, Inc. in this matter.
3. On July 26, 2011, I traveled to the Dryden Road exit off of Interstate 75 (Exit 50 A), near downtown Dayton, Ohio. I observed two digital billboards at this location that were supported in back-to-back relationship by a single support pole. These digital billboards, which are adjacent to and observable from Interstate 75, are depicted in the photographs of Exhibits C1 and C2, attached to this Declaration.
4. The digital billboard shown in attached Exhibit C1 is oriented to face and be viewable to northbound traffic traveling on Interstate 75, and the digital billboard shown in attached Exhibit C2 is orientated to face and be viewable to southbound traffic traveling on Interstate 75.
5. Exhibits C1 and C2 show content being displayed on the digital billboards described above while I was observing these digital billboards on July 26, 2011.

6. Interstate 75 is a major heavily traveled north-south Interstate Highway that connects the Great Lakes and Southeastern regions of the United States.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 27<sup>th</sup> day of July, 2011.

  
Elizabeth M. O'Connor

EXHIBIT

C1

PENGAD 800-631-6989



EXHIBIT

C2

PENGAD 800-631-6989

